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TO: Economic Support Supervisors  
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Training Staff  
Child Care Coordinators  
W-2 Agencies  
Workforce Development Boards  
Job Center Leads and Managers

FROM: Amy Mendel-Clemens  
Communications Section  
Bureau of Health Care Eligibility

**BHCE/BWP OPERATIONS MEMO**

No: 04-06

DATE: 02/12/2004

FS ☒ MA ☒ SC ☐ CTS ☒

CC ☒ W-2 ☒ FSET ☐ EA ☐

CF ☐ JAL ☐ JC ☐ RAP ☐ WIA ☐

WtW ☐ Other EP ☐ ★

PRIORITY: HIGH

SUBJECT: **FOOD STAMP PROGRAM  
REDUCED CHANGE REPORTING PHASE IIA  
12 MONTH CERTIFICATION AND 6 MONTH INTERIM REPORTING**

**CROSS REFERENCE:** 2002 Farm Bill  
Ops Memo 03-42  
Food Stamp Handbook Appendix 21

**EFFECTIVE DATE:** February 28, 2004

**PURPOSE**

This memo outlines the following changes in the Food Stamp (FS) Program:

1. Certification periods changing from 6 months to 12 months for most FS food units.
2. Introduction of the 6-Month Interim Report Form (SMIRF).
3. Addition of a new question on CARES screen ANRQ: "Is this a FS review?"

**BACKGROUND**

Federal regulations and 2002 Farm Bill legislation provide states with the option to increase certification periods from 6 to 12 months for many food stamp cases, with an interim change

report form required to be completed and submitted in the 6th month of the certification period to continue benefit issuance. In keeping with efforts to reduce local agency workload and increase access to the program by removing barriers to participation, 12 month certification periods and interim reporting will be implemented in two phases. Phase IIA, 12 month certification periods for most FS food units, will be implemented effective February 28, 2004. Phase IIB interim reporting will be implemented in July 2004 when the first SMIRF will be due.

## **POLICY**

### 12 MONTH CERTIFICATION PERIOD

Effective February 28, 2004, most FS food units will be certified for 12 months. These food units must continue to report income changes when total monthly earned and unearned income exceeds 130% of the FPL by the 10<sup>th</sup> of the month following the excess income month. This is the same reduced change reporting requirement that went into effect with the Reduced Change Reporting Phase I in July 2003. However, a recertification (review) will no longer be required after 6 months. Instead, an interim change report form will be sent to these food units for completion and submission in the 6th month of the certification period.

### EXCEPTIONS

- Food units that include a migrant or seasonal farm worker, and food units who are homeless at the time of application or recertification will continue to be certified for 6 months. A face-to-face recertification review will still be required in order to continue food stamp benefits. These food units are subject to the reduced change reporting requirements, but will **not** be required to submit a SMIRF.

**NOTE ➤** For a food unit to be considered homeless, all members of the **food unit** must be homeless and coded with the living arrangement 10 (homeless) on ANLA. See Food Stamp Handbook Appendix 09.04.00 for the definition of "homeless".

- Food units that include only elderly, blind or disabled individuals (EBD) with no reported earnings will continue to be certified for 12 months with no change in their change reporting requirements. These food units will not be required to submit a SMIRF.

### CHANGES IN FOOD UNIT TYPE DURING THE CERTIFICATION PERIOD

Some changes reported and acted on during the first 4 months of the certification period can impact the length of the certification period and/or the interim reporting requirement. Food Units that are initially certified for 12 months with an interim reporting requirement, who become homeless, or a migrant has joined the food unit, will have their certification periods shortened to 6 months (from the initial certification date) if the change is acted on prior to adverse action in month 4 of the certification period. These food units will no longer be required to complete a SMIRF, however they will be required to complete a review in the 6<sup>th</sup> and final month of their certification period to maintain FS eligibility.

**NOTE ➤** Once a 6-month certification period has been established the review will remain due in month 6 even if the homeless food unit secures housing, or the migrant worker leaves the food unit prior to the review month.

A food unit that has been certified for 12 months and has a change that causes it to include all elderly, blind, or disabled food unit members with no earned income at any point in the certification period will **not** have an interim reporting requirement. The food units will also no longer be subject to the reduced reporting requirements, however they are subject to the regular change reporting requirements. Language will be added to the food units' notice of decision identifying the change reporting requirements for the food unit.

The attached matrix (Attachment 1) identifies potential changes that may be reported and acted on during the certification period and the impact those changes will have on the length of the certification period and the interim reporting requirement. Remember that all reported changes must be acted on timely in order for the correct certification period and interim reporting requirement to be determined by CARES.

### EXPLAINING THE NEW POLICY TO FOOD STAMP CUSTOMERS

This new policy will be implemented as applications and reviews are completed on FS cases after February 28, 2004. For example, a worker confirming benefits after completing a review on March 12, 2004 will see that the FS review date for the case set at March 31, 2005.

Federal guidance encourages customers be given a verbal explanation of the new interim reporting requirements. Workers will explain the new policy and the 6 Month Interim Report Form process to customers with new applications confirmed after February 28, 2004 and as they complete recertification reviews on existing FS cases for the next 6 months. A suggested script for workers to use has been created and is attached to this memo (see Attachment 2). The script is being provided as a tool so that customers are given the information they need when they are subject to the new policy. It is not intended as a handout for customers, but rather a tool for workers to ensure that customers are given a complete verbal explanation of policy.

A draft of the new 6-Month Interim Report Form (SMIRF) is also being provided (see Attachment 3). It is not intended to be handed out as it is still subject to revision. It may, however, be used to show the customer the types of questions and information that will be required in the SMIRF process.

### **NEW 6 MONTH INTERIM REPORT FORM (SMIRF)**

Another Operations Memo and training material describing the detailed requirements for processing Interim Report forms will be issued later this spring. The following paragraphs provide an overview of the interim reporting requirements.

**Reminder month** = Food units subject to interim reporting will receive notification in the fourth or “**reminder**” month of the 12 month certification period. The reminder month is when the notification is sent to customers who are responsible for completing an interim report form. The notice reminds customers that the interim report will be sent the following month and that paycheck stubs for income received in the following month must be submitted along with the interim report form.

**Change month** = The SMIRF will be sent to these food units in the fifth or “**change**” month of the 12 month certification period. Wage and change information is verified for the change month through the SMIRF. Check stubs and change verification must be sent the following month.

**Return month** = The completed SMIRF and related documentation must be returned in the sixth or “**return**” month of a 12 month certification period. The completed SMIRF must be returned to the agency by the 5<sup>th</sup> of the return month. If the SMIRF is returned and processed timely, FS benefits will continue at the newly determined level.

Using the SMIRF, food units are required to **report and verify gross earned income** received by all food unit members during the change month. Any other changes reported must also be verified. Other changes that must be reported on the SMIRF are:

- Household composition (persons that have moved in or out, including newborns)
- New address and resulting changes in shelter and utility expenses
- New or ended sources of earned income (including self-employment)
- Unearned income sources and amounts
- Total assets that exceed the asset limit for the household
- Change in legal obligation to pay child support

### ***ELIGIBILITY REVIEWS FOR OTHER PROGRAMS AND THEIR IMPACT ON FOOD STAMP CERTIFICATION PERIODS***

Reviews completed for other assistance programs will no longer **automatically** count as a review for FS and will not change the FS certification period. The new question, “Is this a review for Food Stamps?” has been added to ANRQ. Workers who are completing a face-to-face review for FS must answer this with <Y> for the process to count as a recertification for FS. Workers who are completing a face-to-face review for another program of assistance should answer this with “yes” only when the review should also affect the FS certification period.

ANRQ	ELIGIBILITY REVIEW QUESTION	09/11/03 15:51
CASE: 5000507657	WORKER: XCTD57	XCTD57 B KING
LAST UPDATED:	CASE STATUS: OPEN	CASE MODE: INTAKE

IS THIS A FACE-TO-FACE REVIEW? \_

IF YES, SHOULD THIS COUNT AS A FOOD STAMPS REVIEW? \_

### ***IMPACT OF REPORTED CHANGE ON OTHER PROGRAMS***

Information reported by a food unit using a SMIRF is to be treated as a reported change (not a review) for all assistance programs. The information reported must be acted upon timely and entered into CARES with appropriate verification requested where needed.

## CARES CHANGES

In addition to the new question on ANRQ, CARES will now track types of FS assistance groups to determine the length of the certification period and appropriate Interim Reporting Requirements.

The following FS type language, indicating whether the food unit is subject to interim reporting, will appear on the gross and net budget screens and FS allotment screen.

- EBD WITH NO EARNINGS, NO INTERIM REPORTING
- INTERIM REPORTING AG
- HOMELESS, NO INTERIM REPORTING
- MIGRANT, NO INTERIM REPORTING
- TRANSITIONAL FS – 5 MO. CERT. NO INTERIM REPORTING

### EFGT – Food Stamp Gross Income Test

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EFGT                      FOOD STAMP GROSS INCOME TEST                      01/30/04 09:17
CASE: 7700318476 CAT: FS   SEQ: 01   WORKER: XCTG04                      XCTG04 P KIERN
DETERMINATION DATE: 01 30 04      AG STATUS: OPEN      ELIGIBILITY STATUS: PASS
PAYMENT BEGIN DATE: 03 01 04 PAYMENT END DATE:          FS CAT. ELIGIBLE: Y

FS TYPE: Interim reporting AG
TEST FOR PROSPECTIVE MONTH:          1

SELF-EMPLOYMENT-EARNINGS:              .00
EXCESS SELF EMP EXPENSE:-              .00      DEEMED INCOME:              .00
EMPLOYMENT EARNED INCOME:+            400.00      AFDC GRANT:+              .00
GROSS EMPLOYMENT EARNINGS:=            400.00      W2 PAYMENT AMOUNT:+          .00
UNEARNED INCOME:+                      .00      W2 COMP CASE AMOUNT:+        .00
NET FINANCIAL AID INCOME:+              .00      CTS BENEFIT AMOUNT:+        .00
FARM LOSS:-                            .00      OTHER UNEARNED INCOME:+      .00
COUNTABLE GROSS INCOME:=              400.00 SISS/SISE/CTS RECOUPMENT:- .00
                                           UNEARNED INCOME:=            .00

AG SIZE:                              02
GROSS INCOME LIMIT:                    .00

THE AG HAS PASSED THE FOOD STAMP GROSS INCOME TEST

NEXT TRAN: _____ PARMS: 7700318476/FS /01/030104_____ MORE...
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### EFNT – Food Stamp Net Income Test

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EFNT                      FOOD STAMP NET INCOME TEST                      01/30/04 09:19
CASE: 7700318476 CAT: FS   SEQ: 01   WORKER: XCTG04                      XCTG04 P KIERN
DETERMINATION DATE: 01 30 04      AG STATUS: OPEN      ELIGIBILITY STATUS: PASS
PAYMENT BEGIN DATE: 03 01 04 PAYMENT END DATE:          FS CAT. ELIGIBLE: Y

FS TYPE: Interim reporting AG
TEST FOR PROSPECTIVE MONTH:          1

TOTAL MEDICAL COSTS:                  .00
MEDICAL DEDUCTION: -                  .00
EXCESS MEDICAL EXPENSES: =            .00 GROSS INCOME: =            400.00
                                           EARNED INCOME DEDUCTION: -    80.00
                                           STANDARD DEDUCTION: -        134.00

SHELTER COSTS:                        .00
ACTUAL UTILITIES OR STANDARD: =        .00
SHELTER/UTILITY COSTS: =               .00
50% OF ADJUSTED INCOME: -             93.00
EXCESS SHELTER/UTILITY COSTS: =        .00

TOTAL MEDICAL COSTS:                  .00
MEDICAL DEDUCTION: -                  .00
EXCESS MEDICAL EXPENSES: =            .00
DEPENDENT CARE DEDUCTION: -            .00
SUPPORT PAYMENT: -                     .00
ADJUSTED INCOME: =                     186.00
SHELTER DEDUCTION: -                   .00
NET ADJUSTED INCOME: =                 186.00
AG SIZE:                              2
NET INCOME LIMIT:                     1010.00

THE AG HAS PASSED THE FOOD STAMP NET INCOME TEST
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## EFAD – Food Stamp Allotment Determination

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EFNT          FOOD STAMP NET INCOME TEST          01/30/04 09:19
CASE: 7700318476 CAT: FS   SEQ: 01   WORKER: XCTG04   XCTG04 P KIERN
DETERMINATION DATE: 01 30 04   AG STATUS: OPEN   ELIGIBILITY STATUS: PASS
PAYMENT BEGIN DATE: 03 01 04   PAYMENT END DATE:   FS CAT. ELIGIBLE: Y

FS TYPE: Interim reporting AG
TEST FOR PROSPECTIVE MONTH: 1

TOTAL MEDICAL COSTS: .00
MEDICAL DEDUCTION: - .00
EXCESS MEDICAL EXPENSES: = .00
GROSS INCOME: = 400.00
EARNED INCOME DEDUCTION: - 80.00
STANDARD DEDUCTION: - 134.00
EXCESS MEDICAL EXPENSES: - .00
DEPENDENT CARE DEDUCTION: - .00
SHELTER COSTS: .00
SUPPORT PAYMENT: - .00
ACTUAL UTILITIES OR STANDARD: = .00
ADJUSTED INCOME: = 186.00
SHELTER/UTILITY COSTS: = .00
50% OF ADJUSTED INCOME: - 93.00
SHELTER DEDUCTION: - .00
EXCESS SHELTER/UTILITY COSTS: = .00
NET ADJUSTED INCOME: = 186.00
AG SIZE: 2
NET INCOME LIMIT: 1010.00

THE AG HAS PASSED THE FOOD STAMP NET INCOME TEST

NEXT TRAN: _____ PARMS: 7700318476/FS /01/030104_____ MORE...

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**TRAINING**

In response to requests from local agency staff to offer quality training in the most effective and efficient way, DWD/DHFS Partner Training Services (PTS) will be using a distance learning approach to deliver training materials for the Reduced Change Reporting Phase IIA initiative. This approach is made possible by the implementation of an improved Learning Management System (LMS), called the PTS Learning Center. The PTS Learning Center is an upgrade to the current registration system, and beginning in February 2004 will be used to access and track both distance and in-person training events via the Internet. The PTS Learning Center can be accessed at <http://www.uwosh.edu/ccdet/wss/>. A short introduction on how to use the PTS Learning Center is available by clicking the "PTS Learning Center Course Access Resource Guide" link. It is suggested that this information be reviewed prior to beginning the FS Reduced Change Reporting Phase IIA course.

The FS Reduced Change Reporting Phase IIA course will consist of a PowerPoint presentation and a course evaluation. The course is intended to be used in conjunction with this Operations Memo, as well as the attached draft copy of the semi-annual interim report form and script. The training materials in this course are flexible enough to be used in either individual or group settings. As agencies have requested, the training materials that are part of this training course may be utilized in any way they see fit.

It is strongly suggested that any worker who works with the Food Stamp program complete this course.

In the event that students taking the course encounter questions or issues, appropriate content and technical resource contact information will be included on the PTS Learning Center site and within the course materials themselves. It is anticipated that the course will be available on-line from February 9, 2004 until June 30, 2004.

One hour of IM professional development credit will be available upon completion of this on-line course. Those who access and complete the course individually will automatically have course completion recorded on their transcripts. If an agency wishes to use the materials in a group setting (e.g. as part of a staff meeting or mini-training session), please contact Theresa Fosbinder at [Fosbitl@dhfs.state.wi.us](mailto:Fosbitl@dhfs.state.wi.us) or (608) 261-8568 to establish a plan to ensure appropriate credit for all participants.

## **CONTACTS**

BHCE CARES Information & Problem Resolution Center

Email: [carpolcc@dhfs.state.wi.us](mailto:carpolcc@dhfs.state.wi.us)  
Telephone: (608) 261-6317 (Option #1)  
Fax: (608) 267-2269

Note: Email contacts are preferred. Thank you.

★Program Categories – FS – Food Stamps, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WtW – Welfare to Work, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DHFS/DHCF/BHCE/JE